

**OF U.S. DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
(Amarillo)**

STATE OF TEXAS, <i>et al.</i> ,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	No. 2:21-cv-00067-Z
)	
JOSEPH R. BIDEN, JR. in his official)	
capacity as President of the United)	
States of America, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	

MOTION TO WITHDRAW AS COUNSEL

Now comes Plaintiff State of Missouri, by and through the undersigned counsel, requesting the Court (1) grant permission to withdraw Maria A. Lanahan and substitute Louis J. Capozzi, III as attorney of record for said Plaintiff per N.D. Tex. L. Civ. R. 83.12(d) and (2) grant Missouri leave to proceed without local counsel per N.D. Tex. L. Civ. R. 83.10(a). In support of these Motions, Plaintiff Missouri states as follows:

1. Application for Admission Pro Hac Vice was filed by Louis J. Capozzi, III on September 9, 2025 on behalf of the State of Missouri.

2. Maria A. Lanahan will be leaving employment with the Missouri Attorney General and Plaintiff State of Missouri consents to representation by Louis J. Capozzi, III.

3. Maria A. Lanahan is likely to be confirmed soon to the federal bench, as cloture has already been invoked.

4. Further, Plaintiff State of Missouri moves for leave to proceed without local counsel.

5. Though Missouri does not have local counsel through a member of the bar of this Court who resides and maintains his or her principal office in the Northern District of Texas and whose residence or principal office is located within 50 miles of the courthouse in Amarillo, Missouri does have counsel from the Office of the Attorney General of Texas, 300 W. 15th Street, Austin, TX 78711; phone: 512-936-2266; fax: 512-457-4410.

6. Thus, Missouri moves to for leave to proceed with Texas counsel, but without local counsel.

7. Counsel have consented to this motion.

WHEREFORE, Plaintiff State of Missouri requests this Court enter an order allowing Louis J. Capozzi, III to substitute as counsel of record in this case and an order allowing Missouri to proceed without local counsel.

Respectfully submitted,

CATHERINE L. HANAWAY
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Counsel for Plaintiff State of Missouri

CERTIFICATE OF CONFERENCE

I hereby certify that I have received consent for this substitution of counsel motion and motion to proceed without local counsel from Defendants' counsel, so this motion is unopposed.

/s/ Maria A. Lanahan

CERTIFICATE OF SERVICE

This is to certify that on September 9, 2025 a true and correct copy of the foregoing was served upon all parties of record, by the CM/ECF system.

/s/ Maria A. Lanahan